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13 *Attorneys for Plaintiffs William Omar
Castillo Miranda, Juana Maria Miranda,
Osmar Antonio Castillo Blandon, Eugenia
Guadelupe Espinoza Salmeron, and Karla
Vanessa Blandon*

16 **UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA**

18 D.S., a minor by and through his
19 guardian ad litem Elsa Acosta,
individually and as successor-in-interest
20 to William Salgado; C.S., a minor by
and through his guardian ad litem Elsa
21 Acosta, individually and as successor-
in-interest to William Salgado; J.S., a
22 minor by and through her guardian ad
litem Elsa Acosta, individually and as
successor-in-interest to William
23 Salgado; M.S., a minor by and through
her guardian ad litem Elsa Acosta,
24 individually and as successor-in-interest
to William Salgado,

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Attorneys for Defendants

**Case No. 2:23-cv-09412-CBM-AGR
(Consolidated with Case No. 2:24-cv-04898-CBM-AGR)**

*District Judge Consuelo B. Marshall
Magistrate Judge Alicia G. Rosenberg*

**NOTICE OF CONDITIONAL
SETTLEMENT AND REQUEST TO
VACATE ALL DATES**

1 || Plaintiffs,

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CITY OF HUNTINGTON PARK;
NICK NICHOLS; RENE REZA;
MATTHEW RINCON; APRIL
WHEELER; and DOES 5 through 10,
inclusive,

Defendants.

8 WILLIAM OMAR CASTILLO
9 MIRANDA, an individual and as
10 Successor in Interest for Decedent,
11 WILLIAM RENE SALGADO
12 MIRANDA; JUANA MARIA
13 MIRANDA, an individual and as
14 Successor in Interest for Decedent,
15 WILLIAM RENE SALGADO
16 MIRANDA; OSMAR ANTONIO
17 CASTILLO BLANDON, a minor by
18 and through Guardian ad litem,
EUGENIA GUADELUPE ESPINOZA
SALMERON; EUGENIA
GUADELUPE ESPINOZA
SALMERON, an individual; KARLA
VANESSA BLANDON, an individual,

Plaintiffs.

V.

22 CITY OF HUNTINGTON PARK;
23 RENE REZA, an individual; APRIL
24 WHEELER, an individual; MATTHEW
25 RINCON, an individual; NICK
26 NICHOLS, an individual; JOSE A.
YAMASAKI, an individual; SAUL
RODRIGUEZ, an individual; and
DOES 1 TO 10, inclusive.

Defendants

1 **TO THE HONORABLE COURT:**

2 Plaintiffs D.S., C.S., J.S., and M.S. (“*Salgado* Plaintiffs”); Plaintiffs William
3 Omar Castillo Miranda, Juana Maria Miranda, Osmar Antonio Castillo Blandon,
4 Eugenia Guadelupe Espinoza Salmeron, and Karla Vanessa Blandon (“*Miranda*
5 Plaintiffs”); and Defendants City of Huntington Park, Rene Reza, April Wheeler,
6 Matthew Rincon, Nick Nichols, Jose A. Yamasaki, and Saul Rodriguez
7 (“Defendants”), by and through their respective attorneys of record, hereby inform
8 the Court of their conditional settlement of this entire consolidated matter, and
9 respectfully request that the Court vacate all dates in this matter as the parties
10 finalize their settlement, and stipulate as follows.

11 WHEREAS, on April 3, 2025, the parties participated in a mediation with
12 ADR Panel Mediator Richard Copeland.

13 WHEREAS, on May 16, 2025, following the mediation and continued
14 cooperation between Mr. Copeland and counsel for all parties, the pertinent
15 authorities for the City of Huntington Park approved a proposed settlement to
16 resolve both of these consolidated cases in their entirety.

17 WHEREAS, following this approval, a stipulation for settlement has been
18 circulated by Mr. Copeland and has been executed by all parties and counsel except,
19 as of the time of this filing, the representative for the City of Huntington Park.
20 Given upcoming deadlines in this case, the parties wish to make the Court aware of
21 the approval of the settlement and are content to have the remaining dates and
22 deadlines vacated based on the settlement.

23 WHEREAS, the parties respectfully request that all dates and deadlines be
24 vacated based on the parties’ settlement of the entire action.

25 WHEREAS, the parties further request that the Court maintain jurisdiction
26 over this action for sixty (60) days to allow time for the parties to consummate the
27 terms of the settlement, including execution of the release agreement and payment
28 of the settlement funds, and for the parties to subsequently file a stipulated dismissal

1 of the action with prejudice. The parties further request that the Court set a status
2 conference or a deadline for the parties to file a status report in approximately sixty
3 (60) days, at which time the parties can advise the Court of the status of settlement,
4 if dismissal documents have not yet been filed by that time.

5 WHEREAS, based on the above, good cause exists for granting the parties'
6 stipulation.

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Respectfully submitted,

DATED: May 20, 2025

LAW OFFICES OF DALE K. GALIPO

By: /s/ Benjamin S. Levine

Dale K. Galipo

Benjamin S. Levine¹

Attorneys for Plaintiffs D.S., C.S.,

J.S., and M.S.

DATED: May 20, 2025

CARRAZCO LAW, A.P.C.

By: /s/ Kent M. Henderson

Angel Carrazco, Jr.

Kent M. Henderson

Christopher L. Holm

Attorneys for Plaintiff

*Castillo Miranda, Juana Maria
Miranda, Osmar Antonio Castillo
Blandon, Eugenia Guadelupe Espinoza
Salmeron, and Karla Vanessa Blandon*

DATED: May 20, 2025

WOODRUFF & SMART

By: /s/ Caroline A. Byrne

Caroline A. Byrne

Brian A. Moore

Roberta A. Kraus

Attorneys for Defendants

¹ Pursuant to Local Rule 5-4.3.4, as the filer of this document, I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.